

DECLARATIONS AND CURRICULUM VITAE

1. Joyce Reichard

2. Sara Watkins

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

***In re: Suboxone (Buprenorphine/
Naloxone) Film Products Liability
Litigation***

This document relates to: All Actions

Case No. 1:24-md-03092-JPC

Judge J. Philip Calabrese

**Declaration of Joyce Chambers Reichard
for Appointment to Plaintiffs' Steering Committee**

I respectfully submit this declaration in support of my proposed appointment to the Plaintiffs' Steering Committee. This declaration is submitted with the consent and agreement of other interested counsel comprising the proposed co-leads, Plaintiffs' Executive Committee, and Plaintiffs' Steering Committee.

1. I am a Partner of the law firm of Kelley Ferraro LLC. A summary of only some of the firm's history is attached hereto.

2. I graduated from Notre Dame College of Ohio in 2001. I received my law degree in 2016 from Cleveland Marshall College of Law. I was admitted to the State Bar of Ohio on May 15, 2017. I am also admitted to practice in the United States District Court for the Northern District of Ohio (July 3, 2017); the United States District Court for the Southern District of Ohio (February 10, 2020); and have provisional admission to the United States District Courts for the Southern District of Florida, Northern District of Illinois, Western District of Pennsylvania, and District of New Jersey, as they relate to certain MDL actions as noted on the attached List of Cases.

3. I have been appointed to the Plaintiffs' Steering Committee in complex Multi-District Litigation ("MDL") cases including, *In Re: Philips Recalled CPAP, Bi-Level PAP, and Mechanical Ventilator Products Liability Litigation*, Western District of Pennsylvania MDL No. 21-01230, *In Re: East Palestine Train Derailment*, Northern District of Ohio, Eastern Division, MDL Number 4:23-cv-00242, and *In Re: Insulin Pricing Litigation*, District of New Jersey, MDL Number 2:23-mc-03080, among other accomplishments. My role within each of these MDLs is different, some of which require less time commitment than others.

4. I have been an attorney since 2017. In that short amount of time, I have obtained experience as a practicing litigation attorney in complex litigation matters such as the MDL actions listed above, single-event personal injury cases, products liability, and product defect actions, as well as federal, state, and private healthcare

subrogation matters (including appeals before the Department of Health and Human Services). As a litigation attorney, I personally have both second and third chair trial experience, with two cases resulting in multi-million-dollar jury trial verdicts against major U.S. corporations. I also have experience arguing before the Court of Appeals in the Ninth Judicial District, Summit County, Ohio.

Prior to becoming a licensed attorney, I bring twenty-two years of experience as a litigation paralegal in both the corporate and private sectors to the table. I have served my firm in the role of senior litigation paralegal and litigation manager from 2002 through May 2017 where I assisted in the management of one of the largest asbestos and mesothelioma litigation practices in the country (with over 45,000 clients). In 2021, I was honored with the appointment (upon nomination) by the then President of the American Bar Association to function as a voting member of the American Bar Association's Standing Committee on Paralegals, serving a four-year term. I am a former Adjunct Faculty member of the Legal Studies Program at Ursuline College in Pepper Pike, Ohio, where I taught courses in Civil Procedure, Evidence and Discovery, and Microcomputer Applications in the Law. Last, but certainly not least, I have the honor of receiving peer and industry recognition from Super Lawyers, Ohio *Rising Star*, each year from 2019 to present.

5. I represent that I have the time and experience necessary to devote to this matter. In addition, Kelley Ferraro LLC has consistently demonstrated its willingness to commit the attorneys and resources that are necessary for large scale complex aggregate litigation and class actions. This case will be no different.

Kelley Ferraro LLC has numerous other attorneys who will be available to assist in the prosecution of this case, if needed, including attorneys with experience in drafting, discovery and e-discovery, deposition practice, collaborating with expert witnesses, damage analyses, and trial practice. Kelley Ferraro LLC, as it has in past MDLs and other complex class actions, will devote whatever time and resources needed to litigate this matter effectively.

6. My diverse experience, years of experience in complex litigation, along with my dedication to the legal profession, all provide me with the tools and ability to work cooperatively with others on both sides of a case. Throughout my legal career, both as a paralegal and as an attorney, I have built successful relationships with other attorneys, staff members, and court personnel. I am honored to have an opportunity to work alongside the attorneys seeking a leadership appointment in this case.

7. I currently serve as co-counsel for the Plaintiffs in *McCloskey v. Indivior, Inc., et al.*, Case No. 2:24-cv-264 and *Golden v. Indivior, Inc., et al.*, Case No. 2:24-cv-265, both filed in the United States District Court for the Western District of Pennsylvania.

8. I have appeared before Senior Judge Joy Flowers Conti in the United States District Court for the Western District of Pennsylvania; Judge Brian R. Martinotti in the United States District Court for the District of New Jersey; Judges Thomas Teodosio, Donna J. Carr, and Jennifer L. Hensal in the Court of Appeals, Ninth Judicial District, Summit County, Ohio; Judge Harry A. Hanna in the Court of Common Pleas, Cuyahoga County, Ohio; and Judge Alison Breau in the Court of Common Pleas, Summit County, Ohio, among others.

9. I respectfully seek this Court's appointment to the Plaintiffs' Steering Committee in this MDL. If selected, I will dedicate my time and resources, as well as those of my firm, to work cooperatively with all counsel and the Court to advance the fair and just resolution of the cases consolidated in this MDL.

10. A copy of my current *curriculum vitae* is attached.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 1, 2024.

/s/ Joyce Chambers Reichard
Joyce Chambers Reichard (0096422)

CURRICULUM VITAE

Joyce Chambers Reichard

Kelley Ferraro LLC
950 Main Ave., Suite 1300
Cleveland, Ohio 44113

Phone: (216) 575-0777
jreichard@kelley-ferraro.com

Education

Cleveland State University - Cleveland Marshall College of Law – Cleveland, Ohio
May 2016 - Juris Doctor; Certificate in Health Law

- Notre Dame College of Ohio – South Euclid, Ohio
1998 - 2001 – Bachelor of Arts in Paralegal Studies

Experience

Kelley Ferraro, LLC | Cleveland, Ohio

Partner – January 2023 to present

Associate Attorney and Litigation Manager – 2017 – 2022

- Practice Areas: pharmaceutical, product defect, products liability, asbestos, workers' compensation, personal injury, Veterans Administration Benefits, and lien resolution/subrogation.
- Trial Experience: Second and third chair trial experience.
- Plaintiffs' Steering Committee Appointment, Bellwether Trial Committee Co-Chair: *In Re: Philips Recalled CPAP, Bi-Level PAP, and Mechanical Ventilator Products Litigation*.
- Plaintiffs' Steering Committee Appointment, Discovery Subcommittee member: *In Re: East Palestine Train Derailment Litigation*.
- Oversee the day-to-day operations of the Subrogation and Multi-District Litigation departments, including staff.

Kelley & Ferraro, LLP | Cleveland, Ohio

Senior Litigation Paralegal and Litigation Manager | 2002 – 2017

Ursuline College | Lyndhurst, Ohio

Adjunct Faculty Member, Legal Studies Program, UCAP | 2016 – 2022

Kahn & Associates, LLC | Cleveland, Ohio

Senior Litigation Paralegal | 1998 – 2001

Premier Farnell Corporation | Cleveland, Ohio

Legal Administrative Specialist to the Vice President & General Counsel | 1996 – 1998

Bar Admissions

Supreme Court of Ohio
United States District Court, Northern and
Southern Districts of Ohio
United States District Court, Southern District
of Florida (provisional)
United States District Court, Southern District
of New York (provisional)
United States District Court, New Jersey
(provisional)
United States District Court, Northern District
of Illinois (provisional)
United States District Court, Western District of
Pennsylvania (provisional)

Organizations

American Association of Justice
Ohio Association of Justice
Ohio Association of Justice, Women's Caucus
West Shore Bar Association
Legal Aid Society of Cleveland Veterans
Legal Clinic Volunteer
American Bar Association Standing
Committee on Paralegals, Presidential
Nomination, 2021-2024

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

***In re: Suboxone (Buprenorphine/ Naloxone)
Film Products Liability Litigation***

This document relates to: All Actions

Case No. 1:24-md-03092-JPC

Judge J. Philip Calabrese

**Declaration of Sara J. Watkins
for Appointment to Plaintiffs' Steering Committee**

I respectfully submit this declaration in support of my proposed appointment to the Plaintiffs' Steering Committee. This declaration is submitted with the consent and agreement of other interested counsel comprising the proposed co-leads, Plaintiffs' Executive Committee, and Plaintiffs' Steering Committee.

1. I am an attorney at Robert Peirce & Associates, P.,C. in Pittsburgh, PA. Our firm has effectively litigated numerous class actions against oil and gas companies, insurance companies, the Pennsylvania Department of Public Welfare, correctional facilities and others. Capitalizing on the mass tort and complex litigation, the firm has also become involved in pharmaceutical litigation. The firm has represented and continues to represent clients injured by Philips CPAP machines, Suboxone, Round-Up, Vioxx, Bard Power Port, Actos, Cook IVC filters, hernia mesh, proton pump inhibitors (PPI), defective replacement knees and hips, testosterone replacement drugs, Onglyza, Kombiglyze and many others.

2. I graduated from Washington & Jefferson College with a Bachelor of Arts in 2015, with a double major in Political Science and Studio Art. I received my law degree in 2018 from Duquesne University School of Law. I was admitted to the Supreme Court of Pennsylvania in November 2018. I am also admitted to practice in the following Federal Courts:

- a. USDC Western District of Pennsylvania – March 2019
- b. USDC Eastern District of Pennsylvania – May 2021
- c. USDC Middle District of Pennsylvania – June 2021
- d. US Court of Federal Claims – June 2021
- e. US Court of Appeals, 3rd Circuit – November 2023

3. I was appointed to the Leadership Development Committee for *In Re: SoClean, Inc., Marketing, Sales Practices and Products Liability Litigation*, MDL No. 3021 on April 27, 2022.

In addition to my individual leadership appointment, I also assist firm partner, D. Aaron Rihn, Esquire with his position as Co-Liaison counsel in *In Re: Philips Recalled CPAP, Bi-Level Pap, and Mechanical Ventilator Products Litigation* (MDL 3014/2:23-mc-01230) (W.D. Pa.) and his Plaintiff's Steering Committee position in *In re: East Palestine Train Derailment consolidated class action litigation*, No. 4:23-cv-00242 (N.D. Ohio).

4. In the six years since joining Robert Peirce & Associates, P.C., I have litigated numerous successful class actions, including wage and hour violations (*Allen v. Waste Pro*, (Civil Action No.: 8:17-cv-02254-T-36CPT) (M.D.Fla.)); civil rights strip search cases (*McDonald v. Franklin County, Ohio*, (Civil Action No. 2:13-cv-00503-MHW-CMW) (S.D. Ohio)); consumer protection violations (*Metague v. Woodbolt Distribution, LLD d/b/a Nutrabolt*, (Civil Action No. 8:20-cv-02186-PX) (D. Md.)) and (*Erby v. Allstate Insurance Co.*, (Civil Action No. 2:18-04944-PBT) (E.D. Pa.)).

In addition to the class actions mentioned above and the multidistrict litigation matters mentioned in paragraph number 7, I also litigate individual device, civil rights, personal injury, and professional liability matters.

5. Robert Peirce & Associates, P.C. has the necessary resources to litigate this matter in an effective and efficient manner. Through our experience in other MDLs, we have developed

an experienced team of attorneys and staff that are ready and willing to dedicate any time necessary to this litigation. In addition our team, we also have financial resources available to represent the plaintiffs in this matter.

6. Throughout my legal career, I have established meaningful relationships with attorneys in this field, including some of the incredible attorneys seeking leadership appointments in this case. I am honored to have the opportunity to work with the proposed leadership slate and learn from them as we collectively represent our clients in this matter.

7. I currently represents thousands of Plaintiffs in *In Re: Philips Recalled CPAP, Bi-Level Pap, and Mechanical Ventilator Products Litigation* (MDL 3014/2:23-mc-01230) (W.D. Pa.), *In Re: 3M* (MDL 2885/3:19-md-2885) (N.D.FL), *In Re: Zantac* (20-MD-2924) (S.D. FL), and *In Re: Cook Medical, Inc.*, (1:14-ml-2570/MDL 2570) (S.D.IN) and successfully represented Plaintiffs in the *In Re: Actos* (MDL 2299) (W.D.LA), *Prempro MDL*, (MDL Docket No.: 4:03CV1507BRW), as well as the resolved *In Re: Roundup* (16-MD-2741/MDL 2741) (N.D.CA).

8. I represent the Plaintiff in *McCloskey v. Indivior, Inc. et al.*, (W.D. Pa.), and *Golden v. v. Indivior, Inc. et al.*, (W.D. Pa.).¹

9. I have appeared before the following Federal Judges:

USDC Western District of Pennsylvania

Honorable Mark R. Hornak
Honorable Joy Flowers Conti
Honorable J. Nicholas Ranjan
Honorable Maureen P. Kelly
Honorable Cathy Bissoon
Honorable David S. Cercone

USDC Middle District of Pennsylvania

¹ Both cases were filed in the Western District of Pennsylvania and are awaiting a conditional transfer Order to be transferred into the MDL.

Honorable Karoline Mehalchick
Honorable Joseph F. Saporito, Jr.
Honorable William I. Arbuckle

USDC Eastern District of Pennsylvania
Honorable Gene E.K. Pratter

10. I respectfully seek this Court's appointment to the Plaintiffs' Steering Committee in this MDL. If selected, I will dedicate my time and resources, as well as those of my firm, to working cooperatively with all counsel and the Court to advance the fair and just resolution of the cases consolidated in this MDL.

11. A copy of my current *curriculum vitae* is attached.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 1, 2024.

/s/ Sara J. Watkins
Sara J. Watkins

SARA J. WATKINS, ESQ.

Pittsburgh, PA 15201 ♦ (412) 420-9719 ♦ swatkins@peircelaw.com

BAR ADMISSIONS

Supreme Court of Pennsylvania, 2018
U.S. District Court Western District of Pennsylvania, 2019
U.S. District Court Middle District of Pennsylvania, 2021
U.S. District Court Eastern District of Pennsylvania, 2021
U.S. Court of Appeals 3rd Circuit, 2023
U.S. Court of Federal Claims, 2021

EMPLOYMENT HISTORY

Robert Peirce & Associates, P.C.,
Associate Attorney

Pittsburgh, PA
November 2018- Present

Litigating class actions, pharmaceutical/device cases, civil rights matters, personal injury suits, and professional liability matters from inception to resolution.

EDUCATION

Duquesne University School of Law,
Juris Doctor

Pittsburgh, PA
May 2018

Publication: *State Anti-BDS Laws Counteracting the BDS Movement... And the Constitution*, 56 DUQ. L. REV. 199 (2018).
Activities: Duquesne Law Review, *Senior Staff Editor*
Trial Advocacy (Mock Trial) Program
Jewish Law Student Association, *President*

Washington & Jefferson College,
Bachelor of Arts in Political Science & Studio Art

Washington, PA
May 2015

Research: Conducted and presented quantitative political science research:
“Poverty Levels of Different Races”
Honors: Gamma Sigma Alpha (Greek Honors Society)
Pi Sigma Alpha (Political Science Honors Society)

MULTIDISTRICT LITIGATION LEADERSHIP APPOINTMENT

Leadership Development Committee in *In Re: SoClean, Inc., Marketing, Sales Practices and Products Liability Litigation*, MDL No. 3021 on April 27, 2022.

PUBLICATION

State Anti-BDS Laws Counteracting the BDS Movement... And the Constitution, 56 DUQ. L. REV. 199 (2018).

PROFESSIONAL AFFILIATIONS

Allegheny County Bar Association
American Association for Justice (“AAJ”)
Western Pennsylvania Trial Lawyers Association
Pennsylvania Association for Justice
National Trial Lawyers, Top 40 Under 40